

Broadband Over Power Line (BPL)
Notice of Inquiry (ET Docket 03-104)

Comments From
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I have been an amateur radio operator for the better part of 30 years my current call sign is NQ0R. Over those 30 years, I have seen several attempts on the part of various industries to usurp frequencies and spectrum used by Amateur Radio for the public good. I have been involved in handling traffic for hurricanes, tornadoes, phone outages, floods, missing persons and aircraft, and numerous other health and welfare related subjects to which no other communication facility was available. The amateur radio community ("Hams") have continuously given freely of their time, volunteered use of their equipment and maintained a trained and qualified force of communicators that come forward in times of national need and emergencies. The Ham community and our resources are a valuable asset to the United States as has been acknowledged repeatedly by local, state and national agencies. This resource and the spectrum segments used by Amateur Radio must be protected from interference.

Even the existing limited use of RF carriers over power lines has proven to cause harmful interference in several areas due to the BPL users which are supposed to utilize the frequencies on a "non interference basis" with existing licensed services. Amateur, Civil Air Patrol, and Military and other HF communications have been interfered with due to RF being carried over power lines and radiating outside the power plant. The wide spread nature of the interference caused by BPL blankets an entire section of a power grid rendering some frequencies useless over a very wide spread area, in violation of good engineering practice as well as FCC regulations regarding interference. Allowing this to continue and even grow is unconscionable.

The FCC has a charter that requires it to protect licensed users of spectrum. In fact this charter and the principle behind it have been used to protect users in the past with respect to Cable Television interference. The Cable Television industry (CATV) has been required to spend literally hundreds of millions of dollars to prevent, monitor and correct leakage from their systems. CATV systems are required to be "Closed" so that frequencies that are "co-occupied" cannot "leak" out of the system and cause interference. Now the BPL initiatives directly violate the same standards creating a double standard that is hideous at best. Not only is the BPL initiative anathema to good engineering practice, it will cause wide spread interference to licensed services and is patently unfair in light of other regulations that require self-containment of co-licensed frequencies. The Ham community may suffer loss of use of certain spectrum, but the CATV industry may suffer also because of new services that use some of the same frequencies for digital services. Although the CATV digital signals may not be allowed to "leak" out of their system,

the BPL initiative effectively guarantees large scale leakage of signals from the power lines which become huge, multiple wavelength antennae that will broadcast those signals.

To protect the Amateur Radio community as well as the Cable TV industry, the current proposals should be rejected and existing use should be curtailed.